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September 4, 2002

WRITTEN EX PARTE

Ms Marlene H. Dortch  
Secretary  
Federal Communications Commission  
The Portals  
445 12<sup>th</sup> Street, S.W.  
Washington, D.C. 20554

Re: WC Docket No. 02-150

Dear Ms. Dortch:

Attached is a copy of a filing that BellSouth made in Florida Public Service Commission Docket No. 000121-TP on August 30, 2002. Gina Spade, a member of the staff of the Wireline Competition Bureau reviewing BellSouth's pending 271 applications for Alabama, Kentucky, Mississippi, North Carolina and South Carolina requested that BellSouth requested that I send a copy of the document to the staff. Thus I have sent the document electronically to Ms. Spade and also to Aaron Goldberger of the Wireline Competition Division.

In accordance with Section 1.1206, I am filing two copies of this notice and the accompanying attachment and request that you please place them in the record of the proceeding identified above. Thank you.

Sincerely,



Kathleen B. Levitz

**Attachment**

cc: Michelle Carey  
Greg Cooke  
Aaron Goldberger  
Gina Spade  
Susan Pié  
James Davis-Smith

## BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

Development of Permanent Performance )  
Metrics for the Ongoing Evaluation of )  
Operations Support Systems (OSS) )  
Provided for Alternative Local Exchange )  
Carriers' (ALECs) Use by Incumbent Local )  
Exchange Carriers (ILECs) )  
\_\_\_\_\_)

Docket No. 000121-TP

Filed August 30, 2002

### **BELLSOUTH'S PROPOSED PLAN TO MEET PERCENT-OF- CHANGE-REQUESTS-IMPLEMENTED-WITHIN-60-WEEKS-OF- PRIORITIZATION METRIC**

#### **Overview**

On August 9, 2002, the Florida Public Service Commission issued order PSC-02-1094-PAA-TP requiring BellSouth to develop and file a specific action plan pursuant to which it could meet the benchmark established by the implementation of the metric Percent of Change Requests Implemented Within 60 Weeks of Prioritization (CM-11).

The dilemma the 60-week requirement has presented to BellSouth is that compliance with the requirement necessitates changes in the timing and composition of the existing ALEC-approved release implementation schedule. Moreover, while BellSouth may in fact be able to implement prioritized BellSouth- and ALEC-initiated (Types 4 and 5, respectively) change requests by implementation of the following plan, it is not certain that issues other than those foreseen by BellSouth will not arise from following such a plan. In short, as BellSouth anticipated, the development and implementation of the 60-week requirement may remove flexibilities that BellSouth might need to respond to changing circumstances.

In light of its concerns about legitimate capacity constraints, BellSouth appreciates the Commission's recognition that BellSouth is entitled to manage the number of change requests such that those requests do not exceed BellSouth's capacity levels. *See e.g.* Agenda Conference Transcript, 8/6/02, at 20, 22 ("the change control process is very clear. It contains language which says that if BellSouth feels that something is inundating them, in effect, by exceeding the cost that they can bear...they can reject it on the basis of cost.")

BellSouth also reminds this Commission that the FCC, in granting BellSouth's Georgia/Louisiana 271 application, "reject[ed] the assertion of several commenters that BellSouth delays implementation of even very highly prioritized change requests



resulting in a large backlog of unimplemented system feature requests.”<sup>1</sup> Specifically, the FCC based its findings on BellSouth's overall record, recent improvements (including the implementation of several important competitive LEC-requested features), and a commitment to continued improvement. Further, the FCC stated “BellSouth has demonstrated sufficient capacity in its future releases to be able to implement a significant number of change requests, including backlog items to the extent carriers choose to prioritize them.”<sup>2</sup>

### **BellSouth's Release Management Plan**

BellSouth's current release management plan was recently modified in response to Florida Third Party Test Exception 88. BellSouth proposed – and this Commission ordered<sup>3</sup> – the plan by which BellSouth and the ALECs would share in an annual – and equal – split of release capacity.

The “50/50” release management plan ordered by the Commission allocates one-half of planned production release capacity to the ALEC community. The ALECs will prioritize BellSouth and ALEC change requests, (Types 4 and 5, respectively) for the ALEC releases according to their business needs. BellSouth would not have input into this process. Regulatory change requests (Type 2) and defects (Type 6) will be implemented ahead of ALEC-initiated change requests (Type 5) and any BellSouth-initiated (Type 4) change requests that the ALECs elect to include in their production releases. If they so elect, the Type 4 requests will be prioritized with the Type 5 requests after the Types 2 and 6 requests.

Under the plan, BellSouth uses the remaining half of planned production release capacity. BellSouth will prioritize and implement its production release capacity according to its business needs. BellSouth would likewise implement Type 2 and Type 6 change requests ahead of Type 4 change requests. BellSouth may also elect to include ALEC-initiated change requests (Type 5) in its production releases. Again, Types 4 and 5 requests would be implemented after the Types 2 and 6 requests.

Importantly, when the Change Control Process (CCP) ALECs voted to implement the current 2003 release schedule based upon the 50/50 release capacity plan, the 60-week implementation requirement for each ALEC-prioritized change request did not exist. The requirement to implement all prioritized change requests in 60-weeks has required BellSouth to reevaluate the 2003 release schedule. The results of that evaluation have led to a realization that, to meet the Commission's 60-week requirement, the CCP will need to consider modifying the 2003 release schedule.

The first alternative to the 2003 release plan that BellSouth will propose to the CCP to meet the 60-week implementation requirement will result in a higher percentage of

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<sup>1</sup> FCC Order 02-147, at Para. 194.

<sup>2</sup> Id., at Para. 193.

<sup>3</sup> FPSC Order No. PSC-02-1034-FOF-TP.

release capacity being committed to the ALECs. Such a disproportion in release capacity obviously can present difficulties for BellSouth in that BellSouth needs adequate release capacity to implement required and appropriate infrastructure changes. Additionally, the reduced capacity for BellSouth does not allow for any margin of error with initial sizing estimates, which could further alter the release plan. For example, capacity for change requests for EDI Pre-Order and Interactive Agent were underestimated in the initial sizing of the requests due to the complexity of the requests. This may necessitate moving these two requests from Release 12.0 to Release 13.0 within the current plan. Despite these difficulties, BellSouth will propose a plan to CCP, described below, that will allow it to implement prioritized change requests within the 60-week timeframe.

### **BellSouth's Current 2003 Release Schedule**

The current 2003 release schedule<sup>4</sup>, which includes a major industry release, is summarized below.

<b><u>Type of Release</u></b>	<b><u>Est. # of Units<sup>5</sup></u></b>	<b><u>Implementation</u></b>
BellSouth (Release 12.0)	314.0	March 30, 2003
ALEC (Release 13.0)	628.0	May 30, 2003
BellSouth (Release 14.0)	314.0	September 18, 2003
ELMS6 Industry <sup>6</sup> (Release 15.0)	1400.0	November 23, 2003
Maintenance (incl. Defects)	347.5	Various/Interspersed
<b>Total Units</b>	<b>3003.5</b>	

BellSouth indicated to the ALECs, when it provided the release capacity for 2003, that the capacity was based on the program capacity levels dedicated in 2002. BellSouth has consistently stated that this figure is based on funding levels, available dedicated resources, and the amount of change that can historically be absorbed within the software environment without jeopardizing a stable operating environment.

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<sup>4</sup> BellSouth had made 2 release proposals for 2003 to the ALECs – one plan that included an industry release, and one that did not. The ALECs voted for the plan that included the industry release, effectively reducing by about 1400 units the available capacity for ALEC and BellSouth releases due to the capacity requirements of the industry release. That decision also extended by 6 months from end of first quarter 2004 to the end of third quarter 2004 the time by which BellSouth would implement current pending change requests.

<sup>5</sup> 1 Unit = 100 Release Cycle Hours (RCH) of Capacity. As defined in the CCP Document, Appendix H – Preliminary Feature Sizing Model, RCH is the total number of hours estimated for planning, analysis, design, code development, testing and implementation for a single change request.

<sup>6</sup> It has been determined that the ELMS6 Industry release will require an additional 100 units of capacity (now totals 1500). On June 17, 2002, the CCP voted to reduce the ALEC release and one of the BellSouth releases each by 50 units to allow for the revised capacity requirement.



The current plan is in place, and BellSouth will abide by it if the CCP decides such an approach is in the best interest of the industry.<sup>7</sup> There are, however, downsides associated with the current release schedule, the most important of which, from the ALECs' perspective, is that BellSouth will not meet the 60-week implementation requirement for all the prioritized requests. Moreover, as noted above, BellSouth underestimated the work and capacity associated with EDI Pre-Ordering and Interactive Agent, and thus, continuing on the current plan will increase the risk of problems associated with the implementation of those two requests. If the current plan remains in place at the election of the CCP, despite the fact that it will not permit BellSouth to meet the Commission's 60-week requirement, BellSouth should not be penalized for the failure to meet the 60-week requirement, and BellSouth will seek a waiver of any applicable penalties at the appropriate time.

### **BellSouth's Proposed 2003 Release Plan A**

In order to meet the 60-week implementation requirement (and mitigate the current risks surrounding the implementation of EDI Pre-Ordering and Interactive Agent), BellSouth will propose to CCP a revised 2003 release plan. While the specifics of the plan are still being developed and assessed by BellSouth's vendors (Telcordia and Accenture), BellSouth will be prepared to provide more specific details at the CCP Release Package meeting on September 5, 2002 and at subsequent meetings. In addition, BellSouth provided a copy of this filing to all CCP participants via a CCP e-mail on August 30, 2002.

At a high level, the revised 2003 plan and timeline is summarized as follows:

<b><u>Type of Release</u></b>	<b><u>Estimated Implementation Date</u></b>
Release 12.0 (Combined 12.0 & 13.0)	May 30, 2003
Release 13.0 (formerly 14.0)	September 19, 2003
Release 14.0 (formerly 15.0 – Industry)	April 23, 2004 <sup>8</sup>

(NOTE: Maintenance releases are not listed above, but will be scheduled throughout the year, occurring as necessary to meet required CCP defect implementation intervals. Assuming the same 347.5 units projected in the original 2003 plan, maintenance releases would utilize any remaining capacity. This projects to approximately 5 maintenance releases of approximately 70 units per release in 2003.)

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<sup>7</sup> As noted above, BellSouth may need to move EDI Pre-Ordering and Interactive Agent from Release 12.0 to Release 13.0 due to the size and complexity of these requests.

<sup>8</sup> Although actual implementation does not occur until 2004, 1300 of the revised total (see footnote 6) 1500 units (87%) devoted to this release will be utilized in 2003.

As with any plan, certain assumptions are made. To meet the 60-week mandate, BellSouth's proposed plan assumes the following:

- No additional mandated items for implementation
- No other commission orders to implement conflicting CCP process changes
- May/may not schedule Flow-Through Task Force (FTTF) Type 2 requests to be worked ahead of Types 4/5
- Defects will be worked in maintenance releases rather than in production releases unless the timeframes for the defects dictate otherwise (could be placed in a production or unplanned release)
- No overlap of test cycles between releases
- No overlap of test cycles within the same release
- Feature sizing may change as requirements are refined
- Only features with pre-plan sizing will be scoped<sup>9</sup> (i.e., assumes there are industry standards before 60-week clock starts)

Based upon these assumptions and the available capacity, this proposal will allow BellSouth to implement all sized and prioritized Types 4 and 5 change requests in 2003. This is achieved by modifying the releases such that a combined Releases 12.0 and 13.0 (renumbered as 12.0) and Release 14.0 (renumbered as 13.0) are primarily ALEC releases for implementation of CCP and FTTF items.

Additionally, allocating capacity in 2003 to implement existing change requests in 60 weeks allows BellSouth to meet this Commission's ordered defect resolution intervals and prepare for the industry release that includes BellSouth's Integrated Data Network (IDN) migration. It will, however, delay the final implementation of the industry release from November 2003 until early 2004.

BellSouth's proposed plan provides the following benefits to the ALECs:

- Implementation of 24 sized out of 26 CCP items and 6 FTTF items
- Defects handled mainly through maintenance releases
- BellSouth and ALEC testing improved because of non-overlapping of release testing cycles
- Reduces risks by eliminating critical overlapping release phases and by allocating appropriate amount of time to implement EDI Pre-Ordering and Interactive Agent

#### **BellSouth's Proposed 2003 Release Plan B**

Under this proposal, BellSouth will implement the industry release in 2003. However, to do that, and still mitigate the risks associated with EDI Pre-Ordering and Interactive Agent, BellSouth proposes to leave Release 12.0 in place, but move EDI Pre-Ordering and Interactive Agent from Release 12.0 to Release 13.0. BellSouth also proposes to

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<sup>9</sup> "Scoping" a release or feature includes completed business rules and draft user requirements.



eliminate BellSouth's Release 14.0 by rolling that capacity into Release 15.0 (ELMS6). The release schedule would be as follows:

<u>Type of Release</u>	<u>Estimated Implementation Date</u>
Release 12.0 (Minus EDI and IA)	March 30, 2003
Release 13.0 (Add EDI and IA)	May 30, 2003
Release 14.0 (Combined with 15.0)	December 13, 2003

(NOTE: Maintenance releases are not listed above, but will be scheduled throughout the year, occurring as necessary to meet required CCP defect implementation intervals. Assuming the same 347.5 units projected in the original 2003 plan, maintenance releases would utilize any remaining capacity.

While this proposal will not allow BellSouth to meet the Commission's 60-week requirement for implementing sized prioritized change requests (and, thus, BellSouth should not be accountable for penalties if proposal is accepted by the ALECs), it does provide the following benefits to ALECs:

- Maintains implementation of ELMS6 in 2003
- Mitigates risk for implementation of EDI Pre-Order and Interactive Agent
- Removes most of the overlap in testing between releases
- Defects handled mainly through maintenance releases

### **Conclusion**

BellSouth will propose alternative plans to the ALECs that, while modifying the current 2003 Release Plan, will either allow a 60-week change request implementation or to keep the industry release implementation in 2003. To the extent possible, either plan is in concert with the previously expressed wishes of the ALECs.

As BellSouth's alternative proposals make clear, this Commission's 60-week implementation requirement cannot be met without some compromises to that which has been previously established. BellSouth's plans reflect such compromises, given the constraints and assumptions that must be considered to achieve all of the ordered conditions and meet the needs of the ALECs.

This 30<sup>th</sup> day of August, 2002.

BELLSOUTH TELECOMMUNICATIONS, INC.

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